

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BARBARA MOCEK, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

ALLSAINTS USA LIMITED, a foreign
business corporation,

Defendant.

No. 16-cv-8484

Honorable Judge Elaine E. Bucklo

UNOPPOSED MOTION TO SET BRIEFING SCHEDULE

Defendant AllSaints USA Limited (“Defendant”), by and through its undersigned attorneys, respectfully submits this unopposed motion to set a briefing schedule with respect to Defendant’s to-be-filed motion to dismiss Plaintiff Barbara Mocek’s (“Plaintiff”) Complaint (Dkt. #1-1). In support, Defendant states as follows:

1. On August 23, 2016, Defendant’s counsel accepted service of Plaintiff’s Complaint, which was originally filed in the Circuit Court of Cook County, Illinois.
2. On August 30, 2016, Defendant filed a Notice of Removal, removing this action from the Circuit Court of Cook County to this Court. (Dkt. #1.)
3. Defendant plans to file a motion to dismiss the Complaint. Pursuant to Fed. R. Civ. P. 81(c), Defendant’s motion would be due 21 days from service, on September 13, 2016.
4. Counsel for Plaintiff and Defendant have conferred and agreed on the following briefing schedule:
 - a. **September 30, 2016:** Defendant’s motion to dismiss due;
 - b. **October 31, 2016:** Plaintiff’s response due;
 - c. **November 22, 2016:** Defendant’s reply due.

5. This unopposed motion is being made in good faith and not for the purposes of harassment or to cause unnecessary delay.

6. As noted above, Plaintiff has no opposition to this motion.

WHEREFORE, Defendant respectfully requests that this Court grant its unopposed motion and set the briefing schedule for Defendant's motion to dismiss as set forth herein.

Dated: September 7, 2016

Respectfully submitted,

/s/ Michael F. Derksen

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** Pro Hac Vice applications pending*

Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned counsel for AllSaints USA Limited certifies that on September 7, 2016, he caused a copy of the foregoing to be served to all counsel of record via ECF.

/s/ Michael F. Derksen

Michael F. Derksen